

Name: ~~TODD MICHAEL SCHULTZ~~

Address: ~~818 N DOHENY DR. #1108~~

~~WEST HOLLYWOOD, CA 90069~~

Phone: 310-435-5847

Email: toddscultz86@gmail.com

In Pro Per

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA of LOS ANGELES

TODD MICHAEL SCHULTZ

V.

2:23-CV-03452-JAK-MRWx

MICHAEL C. THOMPSON

GREGORY R. HOLMES

YOUTUBE LLC

SECOND MOTION TO COMPEL  
TESTIMONY OF PLAINTIFF'S  
DULY SERVED RFA TO YOUTUBE  
SERVE ON JULY 14<sup>th</sup>, 2023

1. The Requests for Admission concern YouTube's knowledge of and conduct related to the "Hollywood Laughingstock" Channel, which has been brought to light several times in this matter. If YouTube cannot ascertain what is meant by HL Channel they should call Plaintiff and Plaintiff will dutifully go through all existing evidence. Furthermore, there are exhibits set for hearing on

16 September 11<sup>th</sup>, 2023 that should give opposing counsel due notice of what is  
17 3stand.

18 2. YouTube LLC should also know by now wht is meant by “Parking Lot  
19 Creeper” and if they do not, they bare the brunt of responsibility should such a  
20 channel exist on their platform and be causing harm. Plaintiff brought it to their  
21 responisibility months ago. There is little doubt about that. Defendant must explain  
22 how this in unclear.

23 3. Rule 26(d) allows requests for admission to be served prior to the Rule  
24 26(f) conference. In addition, Plaintiff intends to use YouTube's responses as  
25 exhibits in relation to YouTube's forthcoming motion to dismiss, to demonstrate  
26 YouTube's knowledge and involvement, but it’s outright nwillingness to  
27 demonstrate any reasonable knowledgeability or concer for the matter can also be  
28 used to demonstrate something. Which the court shall determine until a jury trial is  
29 had.

30 4. Plaintiff respectfully requests that the Court order YouTube to provide  
31 full and substantive responses to the Requests for Admission within 14 days,  
32 notwithstanding the pendency of the Rule 26(f) conference and motion to  
33 dismiss. This 14 days should come at a cost, because they are out of days as  
34 far as the legal options go. They sprung an objection letter last minute on  
35 Plaintiff to which Plaintiff disagrees with.

36  
37 5. Plaintiff asks court for strict guidance on the legal courses of action or  
38 both parties hereforth.

39  
40 Dated August 19, 2023

Signed By

41 Todd Michael Schultz

42 In Pro Per

43  
44 MOTION TO COMPEL TESTIMONY



2) All communications between defendants, Michael C. Thompson (onward "Thompson"), Gregory R. Holmes (onward "Holmes") and or Youtube concerning or regarding Plaintiff, Mr. Todd Michael Schultz, from starting date of February 28th, 2021 until current day. This shall include any such communications involving Plaintiff's name, nicknames, derogatory names (e.g. Hollywood Laughingstock, Sober House Laughingstock, etc.) or other words used which are intended to refer to or regarding Plaintiff as of July 13th, 2023.

3) A summary containing a list of all channels and aliases created and or used by Thompson, Holmes for the purpose of engaging with Plaintiff, whether it be lawful or otherwise since June 2016 until present day, of July 13th, 2023.

4) private, deleted or otherwise obscured from public view, that has ever been list containing every video and all accompanying titles uploaded, whether

uploaded or otherwise posted to the "Hollywood Laughingstock" channel

(times has been referred to under various aliases (e.g. "Hell Toupee", "onward "HL Channel") as it is referred to in the COMPLAINT, but which at

Hollywood Menace", etc), as of July 13th, 2013.

5) All additional materials (i.e. comments, future plans, prior plans, etc.) related to the creation, upkeep of "HL Channel" and otherwise material contributions not limited to, but including all file types (i.e. .mp4, .mov or any other file type that may be uploaded as a video, image, or text based comment) created by

Thompson and or Holmes as of July 13, 2023.

as

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6) A summary and or list of ALL previous donations, payments or other  
financial contributions provided to Thompson, from Holmes, using any "  
Livestreaming" technology (e.g. Streamlabs, DLive, Youtube, etc.) as of July

13th, 2023.

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I, Plaintiff, contend that this is a non-exhaustive list of required materials, but a  
sufficient start in allowing the court to properly adjudicate - expediently - the  
matter at hand. Further, Plaintiff contends that all listed information is directly  
relevant to the ongoing case. Plaintiff asks the court for an order specifying which  
materials are ORDERED to be COMPELLED for DISCOVERY and to  
provide a TIMELY date for their delivery to plaintiff and the court. pertaining  
to this case and must be offered in order to properly assess damages inflicted by  
Defendants and sustained by Plaintiff.

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Dated: Signed

Thursday, July 13th, 2023 by: Todd Michael Schultz

(Plaintiff)

MOTION TO COMPEL DISCOVERY

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CV-126 (09/09)

**MOTION FOR LEAVE TO AMEND COMPLAINT**